

TITLE V APPLICATION REVIEW

Minor Modification
Project #: N-1112285

Engineer: James Harader
Date: May 22, 2012

Facility Number: N-2253
Facility Name: Ball Metal Food Container Corp LLC
Mailing Address: 300 Gregor Street
Oakdale, CA 95361

Contact Name: Bob Hall
Phone: (303) 460-5445

Responsible Official: Tim Case
Title: EHS Manager

I. PROPOSAL

Ball Metal Food Container Corp LLC is proposing a Title V minor permit modification to incorporate Authority to Construct permits N-2253-15-10, 16-10, and 17-10 into the existing Title V operating permit. These Authority to Construct permits authorized the facility to redirect exhaust from a shared thermal oxidizer into the first two zones of the curing ovens listed on these permits.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

This facility is located at 1021 Industrial Drive in Stockton, CA.

III. EQUIPMENT DESCRIPTION

- N-2253-15-10:** SHEET COATING OPERATION #2 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 7.7 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN
- N-2253-16-10:** SHEET COATING OPERATION #3 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 9.4 MMBTU/HR YOUNG BROS. KELGRAF OVEN (SHARED WITH N-2253-18) WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN
- N-2253-17-10:** SHEET COATING OPERATION #4 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 7.3 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

N-2253-15-10, '-16-10, and '-17-10

The following tables summarize the proposed modifications, which are equivalent for each of the three permits.

Modified Conditions			
Previous TV PTO Condition #	ATC Condition #	New TV PTO Condition #	Proposed Changes to Conditions
This project will not result in any changes to the existing permit conditions			

Removed Conditions	
Previous TV PTO Condition #	Proposed Changes to Conditions
This project will not result in the removal of any conditions from the existing permits	

Added Conditions		
ATC Condition #	New TV PTO Condition #	Proposed Changes to Conditions
This project will not result in the addition of any permit conditions.		

ATC Conditions that were not Added	
ATC Condition #	Proposed Changes to Conditions
1	This condition requires the facility to submit an application to modify the TV permit in accordance with the timeframes and procedures of District Rule 2520. This requirement has not been included on the new permit.
2	This condition requires ATC 15-9, 16-9, or 17-9 to be implemented prior to or simultaneously. This condition will be satisfied; therefore, it will not be included on the TV permit.
3 and 4	These conditions already appear on the facility-wide permit. Therefore, they have not been included on the new permit.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or Conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for

temporary sources of ambient impacts, or a visibility or increment analysis;

4. Do not seek to establish or change a permit term or Condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and Conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permits N-2253-15-12, '-16-12, and '-17-12
- B. Authority to Construct Permits N-2253-15-10, '-16-10, and '-17-10
- C. Title V Compliance Certification Form
- D. Previous Title V Operating Permits N-2253-15-11, '-16-11, and '-17-11 (still draft, awaiting EPA review)

ATTACHMENT A

Proposed Modified Title V Operating Permits
N-2253-15-12, '-16-12, and 17-12

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2253-15-12

EXPIRATION DATE: 10/31/2015

EQUIPMENT DESCRIPTION:

SHEET COATING OPERATION #2 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 7.7 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule and Rule 4604]
3. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control and the VOC emission control system shall reduce VOC emissions , at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64]
5. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1490 Degrees F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4604]
7. Emissions from combustion in the curing oven shall not exceed any of the following limits: 0.024 lb-NOx/MMBtu (equivalent to 2.1 ppmvd NOx @ 19% O2), 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.15 lb-CO/MMBtu (equivalent to 22 ppmvd CO @ 19% O2, or 0.005 lb-VOC/MMBtu. [District Rules 2201 and 4309]
8. Emissions from the shared thermal oxidizer, due to the combustion of natural gas, shall not exceed any of the following limits: 0.098 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.086 lb-CO/MMBtu, and 0.005 lb-VOC/MMBtu. [District Rule 2201]
9. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The operator shall source test the thermal oxidizer at least once every twelve months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
13. The control efficiency of VOC emission control device(s) shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
14. Source testing of the control efficiency of VOC emission control device shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604] Federally Enforceable Through Title V Permit
15. Source testing to measure NOx and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rules 2201 and 4309]
16. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]
18. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]
19. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309]
20. All test results for NOx and CO shall be reported in ppmv @ 19% O2, corrected to dry stack conditions. [District Rule 4309]
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309]
22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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25. If either the NO_x or CO concentrations corrected to 19% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rule 4309]
26. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]
27. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309]
28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]
29. The owner or operator shall submit a VOC Emission Control System Operation and Maintenance Plan in accordance with the provisions outlined in Section 6.5 of District Rule 4604. [District Rule 4604]
30. An operator shall not apply any coating except by the use of one or more of the following methods is utilized: flow, roll, dip, or hand application. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4604]
31. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
32. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in section 5.4.4.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
33. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit
34. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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35. VOC content of coating(s), as applied, and of solvents shall be determined by United States Environmental Protection Agency (EPA) Test Method 24 or 24A, or South Coast Air Quality Management District (SCAQMD) Method 304 (Determination of Volatile Organic Compounds in Various Materials) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
36. The content of exempt halogenated VOCs shall be determined by using the California Air Resources Board (ARB) Test Method 432 or SCAQMD Test Method 303 (Determination of Exempt Compounds) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
37. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
38. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
39. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
40. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit
41. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 4604 and 4309] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2253-16-12

EXPIRATION DATE: 10/31/2015

EQUIPMENT DESCRIPTION:

SHEET COATING OPERATION #3 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 9.4 MMBTU/HR YOUNG BROS. KELGRAF OVEN (SHARED WITH N-2253-18) WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The exhaust stack for the thermal oxidizer shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule and Rule 4604]
4. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control and the VOC emission control system shall reduce VOC emissions, at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64]
6. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1490 Degrees F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4604]
8. Emissions from combustion in the curing oven shall not exceed any of the following limits: 0.024 lb-NOx/MMBtu (equivalent to 2.1 ppmvd NOx @ 19% O₂), 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.15 lb-CO/MMBtu (equivalent to 22 ppmvd CO @ 19% O₂), or 0.005 lb-VOC/MMBtu. [District Rules 2201 and 4309]
9. Emissions from the shared thermal oxidizer, due to the combustion of natural gas, shall not exceed any of the following limits: 0.098 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.086 lb-CO/MMBtu, and 0.005 lb-VOC/MMBtu. [District Rule 2201]
10. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit

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These terms and conditions are part of the Facility-wide Permit to Operate.

11. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall source test the thermal oxidizer at least once every twelve months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
14. The control efficiency of VOC emission control device(s) shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
15. Source testing of the control efficiency of VOC emission control device shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604] Federally Enforceable Through Title V Permit
16. Source testing to measure NOx and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rules 2201 and 4309]
17. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]
18. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]
19. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]
20. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309]
21. All test results for NOx and CO shall be reported in ppmv @ 19% O2, corrected to dry stack conditions. [District Rule 4309]
22. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309]
23. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

26. If either the NO_x or CO concentrations corrected to 19% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rule 4309]
27. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]
28. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309]
29. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]
30. The owner or operator shall submit a VOC Emission Control System Operation and Maintenance Plan in accordance with the provisions outlined in Section 6.5 of District Rule 4604. [District Rule 4604]
31. An operator shall not apply any coating except by the use of one or more of the following methods is utilized: flow, roll, dip, or hand application. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4604]
32. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
33. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in section 5.4.4.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
34. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit
35. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

36. VOC content of coating(s), as applied, and of solvents shall be determined by United States Environmental Protection Agency (EPA) Test Method 24 or 24A, or South Coast Air Quality Management District (SCAQMD) Method 304 (Determination of Volatile Organic Compounds in Various Materials) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
37. The content of exempt halogenated VOCs shall be determined by using the California Air Resources Board (ARB) Test Method 432 or SCAQMD Test Method 303 (Determination of Exempt Compounds) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
38. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
39. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
40. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
41. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit
42. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 4604 and 4309] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2253-17-12

EXPIRATION DATE: 10/31/2015

EQUIPMENT DESCRIPTION:

SHEET COATING OPERATION #4 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 7.3 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule and Rule 4604]
3. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control and the VOC emission control system shall reduce VOC emissions , at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64]
5. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1490 Degrees F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4604]
7. Emissions from combustion in the curing oven shall not exceed any of the following limits: 0.024 lb-NOx/MMBtu (equivalent to 2.1 ppmvd NOx @ 19% O2), 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.15 lb-CO/MMBtu (equivalent to 22 ppmvd CO @ 19% O2, or 0.005 lb-VOC/MMBtu. [District Rules 2201 and 4309]
8. Emissions from the shared thermal oxidizer, due to the combustion of natural gas, shall not exceed any of the following limits: 0.098 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.086 lb-CO/MMBtu, and 0.005 lb-VOC/MMBtu. [District Rule 2201]
9. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The operator shall source test the thermal oxidizer at least once every twelve months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
13. The control efficiency of VOC emission control device(s) shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
14. Source testing of the control efficiency of VOC emission control device shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604] Federally Enforceable Through Title V Permit
15. Source testing to measure NOx and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rules 2201 and 4309]
16. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]
18. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]
19. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309]
20. All test results for NOx and CO shall be reported in ppmv @ 19% O2, corrected to dry stack conditions. [District Rule 4309]
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309]
22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

25. If either the NOx or CO concentrations corrected to 19% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rule 4309]
26. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]
27. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 19% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309]
28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]
29. The owner or operator shall submit a VOC Emission Control System Operation and Maintenance Plan in accordance with the provisions outlined in Section 6.5 of District Rule 4604. [District Rule 4604]
30. An operator shall not apply any coating except by the use of one or more of the following methods is utilized: flow, roll, dip, or hand application. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4604]
31. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
32. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in section 5.4.4.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
33. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit
34. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

35. VOC content of coating(s), as applied, and of solvents shall be determined by United States Environmental Protection Agency (EPA) Test Method 24 or 24A, or South Coast Air Quality Management District (SCAQMD) Method 304 (Determination of Volatile Organic Compounds in Various Materials) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
36. The content of exempt halogenated VOCs shall be determined by using the California Air Resources Board (ARB) Test Method 432 or SCAQMD Test Method 303 (Determination of Exempt Compounds) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
37. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
38. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
39. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
40. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit
41. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 4604 and 4309] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

ATTACHMENT B

Authority to Construct Permits
N-2253-15-10, '-16-10, and '-17-10



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT


HEALTHY AIR LIVING™

COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-2253-15-10

ISSUANCE DATE: 05/26/2011

LEGAL OWNER OR OPERATOR: BALL METAL FOOD CONTAINER CORP.

MAILING ADDRESS: P O BOX 589
BROOMFIELD, CO 80038-0589

LOCATION: 300 W GREGER ST
OAKDALE, CA 95361-8613

EQUIPMENT DESCRIPTION:

MODIFICATION OF SHEET COATING OPERATION #2 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 7.7 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER. TO INSTALL A HEAT RECOVERY SYSTEM THAT TRANSFERS SHARED THERMAL OXIDIZER EXHAUST GAS INTO THE CURING OVEN

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Authority to Construct N-2253-15-9 shall be implemented prior to or concurrent with the implementation of this Authority to Construct. [District Rule 2201]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule and Rule 4604]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Sayed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services

N-2253-15-10: May 26 2011 9:43AM -- HARADERJ Joint Inspection NOT Required

7. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control and the VOC emission control system shall reduce VOC emissions, at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64]
9. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
10. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1490 Degrees F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4604]
11. Emissions from combustion in the curing oven shall not exceed any of the following limits: 0.024 lb-NO_x/MMBtu (equivalent to 2.1 ppmvd NO_x @ 19% O₂), 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.015 lb-CO/MMBtu (equivalent to 22 ppmvd CO @ 19% O₂, or 0.005 lb-VOC/MMBtu. [District Rules 2201 and 4309]
12. Emissions from the shared thermal oxidizer, due to the combustion of natural gas, shall not exceed any of the following limits: 0.098 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.086 lb-CO/MMBtu, and 0.005 lb-VOC/MMBtu. [District Rule 2201]
13. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit
14. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The operator shall source test the thermal oxidizer at least once every twelve months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
17. The control efficiency of VOC emission control device(s) shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
18. Source testing of the control efficiency of VOC emission control device shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604] Federally Enforceable Through Title V Permit
19. Source testing to measure NO_x and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rules 2201 and 4309]
20. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]
21. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]
22. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]

CONDITIONS CONTINUE ON NEXT PAGE

23. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309]
24. All test results for NO_x and CO shall be reported in ppmv @ 19% O₂, corrected to dry stack conditions. [District Rule 4309]
25. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309]
26. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
27. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309]
29. If either the NO_x or CO concentrations corrected to 19% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rule 4309]
30. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions ~~representative of normal operations or conditions specified in the Permit to Operate.~~ The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]
31. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309]
32. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]
33. The owner or operator shall submit a VOC Emission Control System Operation and Maintenance Plan in accordance with the provisions outlined in Section 6.5 of District Rule 4604. [District Rule 4604]
34. An operator shall not apply any coating except by the use of one or more of the following methods is utilized: flow, roll, dip, or hand application. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4604]

CONDITIONS CONTINUE ON NEXT PAGE

35. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
36. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in section 5.4.4.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
37. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit
38. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit
39. VOC content of coating(s), as applied, and of solvents shall be determined by United States Environmental Protection Agency (EPA) Test Method 24 or 24A, or South Coast Air Quality Management District (SCAQMD) Method 304 (Determination of Volatile Organic Compounds in Various Materials) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
40. The content of exempt halogenated VOCs shall be determined by using the California Air Resources Board (ARB) Test Method 432 or SCAQMD Test Method 303 (Determination of Exempt Compounds) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
41. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
42. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
43. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
44. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit
45. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 4604 and 4309] Federally Enforceable Through Title V Permit



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT


HEALTHY AIR LIVING™

COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-2253-16-10

ISSUANCE DATE: 05/28/2011

LEGAL OWNER OR OPERATOR: BALL METAL FOOD CONTAINER CORP.

MAILING ADDRESS: P O BOX 589
BROOMFIELD, CO 80038-0589

LOCATION: 300 W GREGER ST
OAKDALE, CA 95361-8613

EQUIPMENT DESCRIPTION:

MODIFICATION OF SHEET COATING OPERATION #3 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 9.4 MMBTU/HR YOUNG BROS. KELGRAF OVEN (SHARED WITH N-2253-18) WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER. TO INSTALL A HEAT RECOVERY SYSTEM THAT TRANSFERS SHARED THERMAL OXIDIZER EXHAUST GAS INTO THE CURING OVEN

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Authority to Construct N-2253-16-9 shall be implemented prior to or concurrent with the implementation of this Authority to Construct. [District Rule 2201]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. The exhaust stack for the thermal oxidizer shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services

N-2253-16-10: May 28 2011 9:13AM -- HARADERJ Joint Inspection NOT Required

7. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule and Rule 4604]
8. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control and the VOC emission control system shall reduce VOC emissions, at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64]
10. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
11. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1490 Degrees F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4604]
12. Emissions from combustion in the curing oven shall not exceed any of the following limits: 0.024 lb-NOx/MMBtu (equivalent to 2.1 ppmvd NOx @ 19% O2), 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.015 lb-CO/MMBtu (equivalent to 22 ppmvd CO @ 19% O2, or 0.005 lb-VOC/MMBtu. [District Rules 2201 and 4309]
13. Emissions from the shared thermal oxidizer, due to the combustion of natural gas, shall not exceed any of the following limits: 0.098 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.086 lb-CO/MMBtu, and 0.005 lb-VOC/MMBtu. [District Rule 2201]
14. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit
15. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The operator shall source test the thermal oxidizer at least once every twelve months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
18. The control efficiency of VOC emission control device(s) shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
19. Source testing of the control efficiency of VOC emission control device shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604] Federally Enforceable Through Title V Permit
20. Source testing to measure NOx and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rules 2201 and 4309]
21. NOX emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]

CONDITIONS CONTINUE ON NEXT PAGE

22. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]
23. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]
24. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309]
25. All test results for NO_x and CO shall be reported in ppmv @ 19% O₂, corrected to dry stack conditions. [District Rule 4309]
26. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309]
27. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
29. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309]
30. If either the NO_x or CO concentrations corrected to 19% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rule 4309]
31. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]
32. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309]
33. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]

CONDITIONS CONTINUE ON NEXT PAGE

34. The owner or operator shall submit a VOC Emission Control System Operation and Maintenance Plan in accordance with the provisions outlined in Section 6.5 of District Rule 4604. [District Rule 4604]
35. An operator shall not apply any coating except by the use of one or more of the following methods is utilized: flow, roll, dip, or hand application. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4604]
36. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
37. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in section 5.4.4.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
38. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit
39. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit
40. VOC content of coating(s), as applied, and of solvents shall be determined by United States Environmental Protection Agency (EPA) Test Method 24 or 24A, or South Coast Air Quality Management District (SCAQMD) Method 304 (Determination of Volatile Organic Compounds in Various Materials) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
41. The content of exempt halogenated VOCs shall be determined by using the California Air Resources Board (ARB) Test Method 432 or SCAQMD Test Method 303 (Determination of Exempt Compounds) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
42. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
43. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
44. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
45. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

46. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 4604 and 4309] Federally Enforceable Through Title V Permit



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT


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COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-2253-17-10

ISSUANCE DATE: 05/26/2011

LEGAL OWNER OR OPERATOR: BALL METAL FOOD CONTAINER CORP.

MAILING ADDRESS: P O BOX 589
BROOMFIELD, CO 80038-0589

LOCATION: 300 W GREGER ST
OAKDALE, CA 95361-8613

EQUIPMENT DESCRIPTION:

MODIFICATION OF SHEET COATING OPERATION #4 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 7.3 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER. TO INSTALL A HEAT RECOVERY SYSTEM THAT TRANSFERS SHARED THERMAL OXIDIZER EXHAUST GAS INTO THE CURING OVEN

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Authority to Construct N-2253-17-9 shall be implemented prior to or concurrent with the implementation of this Authority to Construct. [District Rule 2201]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule and Rule 4604]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services
N-2253-17-10 - May 26 2011 9:43AM - HARADER - Joint Inspection NOT Required

7. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control and the VOC emission control system shall reduce VOC emissions, at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604; Sections 5.1 and 5.4 (9/20/07). [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64]
9. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
10. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1,490 Degrees F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4604]
11. Emissions from combustion in the curing oven shall not exceed any of the following limits: 0.024 lb-NOx/MMBtu (equivalent to 2.1 ppmvd NOx @ 19% O₂), 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.015 lb-CO/MMBtu (equivalent to 22 ppmvd CO @ 19% O₂), or 0.005 lb-VOC/MMBtu. [District Rules 2201 and 4309]
12. Emissions from the shared thermal oxidizer, due to the combustion of natural gas, shall not exceed any of the following limits: 0.098 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.086 lb-CO/MMBtu, and 0.005 lb-VOC/MMBtu. [District Rule 2201]
13. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit
14. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The operator shall source test the thermal oxidizer at least once every twelve months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
17. The control efficiency of VOC emission control device(s) shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
18. Source testing of the control efficiency of VOC emission control device shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604] Federally Enforceable Through Title V Permit
19. Source testing to measure NOx and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rules 2201 and 4309]
20. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]
21. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]
22. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]

CONDITIONS CONTINUE ON NEXT PAGE

23. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309]
24. All test results for NOx and CO shall be reported in ppmv @ 19% O2, corrected to dry stack conditions. [District Rule 4309]
25. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309]
26. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
27. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309]
29. If either the NOx or CO concentrations corrected to 19% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rule 4309]
30. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions ~~representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated,~~ maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]
31. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 19% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309]
32. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]
33. The owner or operator shall submit a VOC Emission Control System Operation and Maintenance Plan in accordance with the provisions outlined in Section 6.5 of District Rule 4604. [District Rule 4604]
34. An operator shall not apply any coating except by the use of one or more of the following methods is utilized: flow, roll, dip, or hand application. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4604]

CONDITIONS CONTINUE ON NEXT PAGE

35. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
36. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in section 5.4.4.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
37. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit
38. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit
39. VOC content of coating(s), as applied, and of solvents shall be determined by United States Environmental Protection Agency (EPA) Test Method 24 or 24A, or South Coast Air Quality Management District (SCAQMD) Method 304 (Determination of Volatile Organic Compounds in Various Materials) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
40. The content of exempt halogenated VOCs shall be determined by using the California Air Resources Board (ARB) Test Method 432 or SCAQMD Test Method 303 (Determination of Exempt Compounds) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
41. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f) The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
42. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
43. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
44. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit
45. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 4604 and 4309] Federally Enforceable Through Title V Permit

ATTACHMENT C

Title V Compliance Certification Form

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

☐ SIGNIFICANT PERMIT MODIFICATION
☒ MINOR PERMIT MODIFICATION

☐ ADMINISTRATIVE
AMENDMENT

COMPANY NAME: Ball Metal Food Container Corp., LLC	FACILITY ID: N 2253
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Ball Corporation	
3. Agent to the Owner: NA	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:


Signature of Responsible Official

12/19/2011
Date

Tim Case
Name of Responsible Official (please print)

Manager, EHS
Title of Responsible Official (please print)

ATTACHMENT D

Previous Title V Operating Permits
N-2253-15-11, '-16-11, and '-17-11
Still draft, awaiting EPA review

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2253-15-11

EXPIRATION DATE: 10/31/2015

EQUIPMENT DESCRIPTION:

SHEET COATING OPERATION #2 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 7.7 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule and Rule 4604] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control and the VOC emission control system shall reduce VOC emissions , at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1490 Degrees F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4604] Federally Enforceable Through Title V Permit
7. Emissions from combustion in the curing oven shall not exceed any of the following limits: 0.024 lb-NOx/MMBtu (equivalent to 2.1 ppmvd NOx @ 19% O2), 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.15 lb-CO/MMBtu (equivalent to 22 ppmvd CO @ 19% O2, or 0.005 lb-VOC/MMBtu. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
8. Emissions from the shared thermal oxidizer, due to the combustion of natural gas, shall not exceed any of the following limits: 0.098 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.086 lb-CO/MMBtu, and 0.005 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The operator shall source test the thermal oxidizer at least once every twelve months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
13. The control efficiency of VOC emission control device(s) shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
14. Source testing of the control efficiency of VOC emission control device shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604] Federally Enforceable Through Title V Permit
15. Source testing to measure NOx and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
16. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
18. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
19. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309] Federally Enforceable Through Title V Permit
20. All test results for NOx and CO shall be reported in ppmv @ 19% O2, corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

25. If either the NOx or CO concentrations corrected to 19% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit
26. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]
27. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 19% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309] Federally Enforceable Through Title V Permit
28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit
29. The owner or operator shall submit a VOC Emission Control System Operation and Maintenance Plan in accordance with the provisions outlined in Section 6.5 of District Rule 4604. [District Rule 4604] Federally Enforceable Through Title V Permit
30. An operator shall not apply any coating except by the use of one or more of the following methods is utilized: flow, roll, dip, or hand application. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
31. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
32. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in section 5.4.4.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
33. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit
34. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

35. VOC content of coating(s), as applied, and of solvents shall be determined by United States Environmental Protection Agency (EPA) Test Method 24 or 24A, or South Coast Air Quality Management District (SCAQMD) Method 304 (Determination of Volatile Organic Compounds in Various Materials) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
36. The content of exempt halogenated VOCs shall be determined by using the California Air Resources Board (ARB) Test Method 432 or SCAQMD Test Method 303 (Determination of Exempt Compounds) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
37. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
38. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
39. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
40. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit
41. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 4604 and 4309] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

DRAFT

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2253-16-11

EXPIRATION DATE: 10/31/2015

EQUIPMENT DESCRIPTION:

SHEET COATING OPERATION #3 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 9.4 MMBTU/HR YOUNG BROS. KELGRAF OVEN (SHARED WITH N-2253-18) WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The exhaust stack for the thermal oxidizer shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule and Rule 4604] Federally Enforceable Through Title V Permit
4. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control and the VOC emission control system shall reduce VOC emissions, at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1490 Degrees F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4604] Federally Enforceable Through Title V Permit
8. Emissions from combustion in the curing oven shall not exceed any of the following limits: 0.024 lb-NOx/MMBtu (equivalent to 2.1 ppmvd NOx @ 19% O₂), 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.15 lb-CO/MMBtu (equivalent to 22 ppmvd CO @ 19% O₂), or 0.005 lb-VOC/MMBtu. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
9. Emissions from the shared thermal oxidizer, due to the combustion of natural gas, shall not exceed any of the following limits: 0.098 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.086 lb-CO/MMBtu, and 0.005 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit
11. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall source test the thermal oxidizer at least once every twelve months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
14. The control efficiency of VOC emission control device(s) shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
15. Source testing of the control efficiency of VOC emission control device shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604] Federally Enforceable Through Title V Permit
16. Source testing to measure NOx and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
17. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
18. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
19. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
20. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309] Federally Enforceable Through Title V Permit
21. All test results for NOx and CO shall be reported in ppmv @ 19% O2, corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
22. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
23. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

25. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309] Federally Enforceable Through Title V Permit
26. If either the NO_x or CO concentrations corrected to 19% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit
27. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit
28. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309] Federally Enforceable Through Title V Permit
29. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit
30. The owner or operator shall submit a VOC Emission Control System Operation and Maintenance Plan in accordance with the provisions outlined in Section 6.5 of District Rule 4604. [District Rule 4604] Federally Enforceable Through Title V Permit
31. An operator shall not apply any coating except by the use of one or more of the following methods is utilized: flow, roll, dip, or hand application. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
32. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
33. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in section 5.4.4.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
34. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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35. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit
36. VOC content of coating(s), as applied, and of solvents shall be determined by United States Environmental Protection Agency (EPA) Test Method 24 or 24A, or South Coast Air Quality Management District (SCAQMD) Method 304 (Determination of Volatile Organic Compounds in Various Materials) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
37. The content of exempt halogenated VOCs shall be determined by using the California Air Resources Board (ARB) Test Method 432 or SCAQMD Test Method 303 (Determination of Exempt Compounds) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
38. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
39. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
40. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
41. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit
42. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 4604 and 4309] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2253-17-11

EXPIRATION DATE: 10/31/2015

EQUIPMENT DESCRIPTION:

SHEET COATING OPERATION #4 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 7.3 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule and Rule 4604] Federally Enforceable Through Title V Permit
3. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control and the VOC emission control system shall reduce VOC emissions, at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1490 Degrees F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4604] Federally Enforceable Through Title V Permit
7. Emissions from combustion in the curing oven shall not exceed any of the following limits: 0.024 lb-NOx/MMBtu (equivalent to 2.1 ppmvd NOx @ 19% O2), 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.15 lb-CO/MMBtu (equivalent to 22 ppmvd CO @ 19% O2, or 0.005 lb-VOC/MMBtu. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
8. Emissions from the shared thermal oxidizer, due to the combustion of natural gas, shall not exceed any of the following limits: 0.098 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.086 lb-CO/MMBtu, and 0.005 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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10. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The operator shall source test the thermal oxidizer at least once every twelve months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
13. The control efficiency of VOC emission control device(s) shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
14. Source testing of the control efficiency of VOC emission control device shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604] Federally Enforceable Through Title V Permit
15. Source testing to measure NOx and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
16. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
18. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
19. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309] Federally Enforceable Through Title V Permit
20. All test results for NOx and CO shall be reported in ppmv @ 19% O2, corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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25. If either the NOx or CO concentrations corrected to 19% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit
26. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit
27. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 19% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309] Federally Enforceable Through Title V Permit
28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit
29. The owner or operator shall submit a VOC Emission Control System Operation and Maintenance Plan in accordance with the provisions outlined in Section 6.5 of District Rule 4604. [District Rule 4604] Federally Enforceable Through Title V Permit
30. An operator shall not apply any coating except by the use of one or more of the following methods is utilized: flow, roll, dip, or hand application. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4604] Federally Enforceable Through Title V Permit
31. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
32. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in section 5.4.4.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
33. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit
34. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

35. VOC content of coating(s), as applied, and of solvents shall be determined by United States Environmental Protection Agency (EPA) Test Method 24 or 24A, or South Coast Air Quality Management District (SCAQMD) Method 304 (Determination of Volatile Organic Compounds in Various Materials) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
36. The content of exempt halogenated VOCs shall be determined by using the California Air Resources Board (ARB) Test Method 432 or SCAQMD Test Method 303 (Determination of Exempt Compounds) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
37. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
38. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
39. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
40. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit
41. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 4604 and 4309] Federally Enforceable Through Title V Permit

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